

Ernest K. Wilkerson  
Plaintiff  
VS.

Civil No: 96-4920(JBS)

Steve Hallett  
Defendant

RECEIVED

AUG 05 2009

JEROME B. SIMANDLE  
U.S. DISTRICT JUDGE

July 31, 2009

(NON-JURY)

Re: Joint Final Pretrial Order

Dear Judge Jerome B. Simandle

Enclosed Please Find A Copy Of The Joint Final Pretrial Order Instructed By The Court From The Plaintiff Ernest K. Wilkerson Pro Se. With The Exhibits. I Have Sent A Copy To The Defendant Steve Hallett like I Was Instructed. And A Copy To Judge Ann Marie Donio Also. Thank You For Your Time In This Matter!

cc: Judge Ann Marie Donio  
Steve Hallett

Ernest K. Wilkerson Pro Se

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE  
HONORABLE Jerome B. Simandle**

**Ernest K. Wilkerson  
Plaintiff**

**31 July 2009**

**vs.**

**Steve Hallet  
Defendant**

**(NON- JURY)  
Civil No.96-4920-JBS-AMD**

**JOINT FINAL PRETRIAL ORDER**

The following shall constitute the Final Pretrial Order pursuant to Rule 16, Federal Rules of Civil Procedure. This Final Order shall Govern the conduct of the trial of this case. Amendments to this order will be allowed only in exceptional circumstances to prevent manifest injustice. See Fed. R. Civ. P. 16(e). Counsel are urged to move to amend in a timely fashion any portion of the Order that must changed or modified between the filing of the Order and the trial date.

**APPEARANCES:**

**Ernest Wilkerson, Plaintiff, pro se**

**Steve Hallett, Esq. Defendant**

**PART I JURISDICTION and BRIEF SUMMARY OF THE CASE**

**Counsel shall specifically set fourth the jurisdictional basis of the action as well**

**a brief summary of the claims and defenses**

**PART II STIPULATED FACTS**

**Stipulated facts shall be set fourth in numbered paragraphs**

### **PART III PLAINTIFFS CONTESTED FACTS**

1. Plaintiff intends to prove the following contested facts with regard to liability.
2. Plaintiff intends to prove the following contested facts with regard to damages.

### **STIPULATED FACTS AND CONTESTED FACTS**

(1) On August 4, 1986, Ernest Wilkerson purchased a Chevrolet Corvette Convertible

(V.I.N. 1G1YY6787G5907246) for at least \$ 31,000

(2) Wilkerson was incarcerated in 1994 and released on July 26, 2008. Upon, his incarceration, Wilkerson asked his girlfriend, Rashida Brown, to hold his car for him for the duration of his imprisonment. (Pl.Br. at 2.)

(3) On August 14, 1994, Brown took the title to the car by forging alterations to the certificate of title papers to reflect the sale from Wilkerson to herself for \$1000. Wilkerson never agreed to the sale nor received any money from the forged sale.

(4) On August 18, 1994, Brown rented a space at the storage facility in order to store the allegedly stolen car. Plaintiff alleges that Mr. Irvin B. Pierce, Assistant Manger for Public Storage, told him in a phone conversation that Brown needed a Power Of Attorney (POA) in order to store the car in the facility:

(5) Brown sought a POA, and approached defendant Steve Hallet for assistance. On September 26, 1994, Steve Hallett, Esq. prepared a POA for Brown, Witnessed by Hallet's secretary, Marion Jefferson.

(See Exhibit 1)

(6) A reasonable inference can be made that signature of Ernest Wilkerson that appears on the POA is forged, since Wilkerson was in jail at the time the POA was created and Hallett did not go to the prison to witness Wilkerson signing the POA.

(7) Brown evidently used the POA in two distinct ways. First, she used a copy of the POA, to enable her to store the car, as is indicated by storage facility's stamp on its copy of the POA which suggests the storage facility received the POA on September 29, 1994. Second, Brown used the POA on September 29, 1994 in order to withdraw \$ 681.22 from Wilkerson's bank account. The withdraw was made against Wilkerson's wishes and without his permission.

(8) On October 30, 1994, Brown transferred the ownership of the car to her mother, Virginia Council.

(9) On February 26, 1995 Council sold the car to Northeast Auto Imports for \$ 5000. After Council presented all the legally required documents ( including the Certificate of Title in Council's name , a valid Vehicle Registration Card in her name , her New Jersey driver's license , and her insurance card)

(10)Plaintiff filed the Complaint On October 21,1996, in which he named as defendants the following entitles : Rashida Bron , Virginia Council , Steve Hallett,Esq. Rodnet Thompson ,Esq. Marion Jefferson ,Sec.Public Storage , Inc. Joe Duddy ,Irvin B. Pierce ,Northeast Auto Imports ,Inc. and Randy Lebowitz . The Complaint alleges that each of these defendants had a role in the theft of the plaintiff's car and that some of the defendants (Brown, Hallett, Thompson, and Jefferson) were also involved in the theft of his money.

(11) On January 14, 1998, plaintiff voluntarily dismissed defendants Public Storage, Inc. Irvin B. Pierce and Joe Duddy, and this court entered an Order dismissing the Complaint with prejudice as to say defendants.

(12) On 8<sup>th</sup> of July 2009, An Order was entered denying the Defendants motion for summary judgments.

#### **PART IV WITNESSES and SUMMARY OF TESTIMONY**

1. Defendant intends to prove the following contested facts with regard to liability
2. Defendant intends to prove the following contested facts with regard to damages;

#### **PART V WITNESSES AND SUMMARY OF TESTIMONY**

Only the witnesses whose names and addresses are listed herein will be permitted to testify at the time of trial. For each witness listed, there must a description of their testimony. Any objection to a witness must be noted by opposing counsel and for each such witness objected to, the name of the witness and the reason for the reason for the objection shall be given.

##### **A. Plaintiff's Witnesses and Summary Of Their Summary**

1. Plaintiffs intends to call the following witnesses with regard to liability and anticipates they will testify as follows:

**ERNEST WILKERSON**

2. Plaintiffs intends to call the following witnesses with regard to damages and anticipates they will testify as follows:

**ERNEST WILKERSON**

**B. Defendants Objections to Plaintiffs Witnesses:** If there are no objections to any of the witnesses, defendant shall so state that in this portion of the Order. Any objections to any plaintiffs witnesses, they shall be listed here.

**C. Defendants Witnesses and Summary of their Testimony**

1. Defendant intends to call the following witnesses with regard to liability and anticipates they will testify as follows:
2. Defendant intends to call the following witnesses with regard to damages and anticipates they will testify as follows:

**D. Plaintiffs Objections To Defendants Witnesses:** If there any no objections to any of the witnesses, plaintiff shall so state that in this portion of the Order. If there are objections to any of defendant's witnesses, shall be listed here.

#### **PART VI Expert Witnesses**

Any prior scheduling of the court concerning experts is applicable to this action and the directives of the Scheduling Order shall govern expert testimony in this case. Any expert not listed in this portion of the Final Pretrial Order shall not be permitted to testify at the time of trial. Additionally, the curriculum vitae of every expert expected to testify at the time of trial shall be attached to this final Pretrial Order. The curriculum vitae or summary of the experts qualifications may be read into the record at the time the expert takes the stand and no opposing counsel shall be permitted to question the qualifications of the expert unless the basis of the objection is set fourth in his Final Pretrial Order. No expert will be permitted to testify at trial unless all opposing counsel has received the curriculum vitae of the expert and the information required by Fed. R.Civ.P. 26(a) (2) as directed in the Scheduling Order.

If any hypothetical questions are to be out to an expert witness on direct examination, they shall be written in advance and submitted to the court and counsel prior to commencement of trial.

1. Plaintiff expert witnesses are :

2. Defendants objection to the qualification of plaintiffs expert witnesses are : ( The objections shall be referenced to the name of each listed expert )
3. Defendants expert witnesses are :
4. Plaintiffs objection to the qualification of plaintiff expert witnesses are :  
(The objections shall be referenced to the name of each listed expert.)
5. NONE ON BEHALF OF PLAINTIFF

## **PART VII EXHIBITS**

In this section of the Final Pretrial Order, counsel should number each proposed exhibit and upon receipt of the exhibit list of an adversary, opposing counsel should prepare a response to this exhibit list indicating as to each exhibit whether there will be objection and if there is, the nature of the objection, Absent an extraordinary showing of good cause , **ONLY EXHIBITS LISTED BELOW SHALL BE INTRODUCED AT THE TIME OF TRIAL** . You are not required to list exhibits that will be used, if at all, only for impeachment purposes.

Counsel are reminded that each such exhibits shall be physically pre – marked corresponding to the designation below. Copies of exhibit lists shall be provided to the DISTRICT JUDGE and assigned court reporter at the time of trial.

### **A. Plaintiffs Exhibits**

1. Plaintiff intends to introduce the following exhibits into evidence (list by number with a description of each exhibit ) Ex.1 –Power Of Attorney  
Ex .2- Bank Statements, Ex. 3- purchase receipt for car
2. Plaintiff intends objects to the introduction of plaintiffs exhibits (set fourth number of exhibit and grounds for objection). Ex .2- Bank Statements

### **B. Defendants Exhibits**

1. Defendant intends to introduce the following exhibits into evidence (list by number with a description of each exhibit) ;
2. Plaintiff objects to the introduction of plaintiffs exhibits (set fourth number of exhibit and grounds for objection )

## **PART VIII LAW**

- B. Plaintiff statement of the legal issues in this case:

1. The Defendants participated in the forgery of my signature on the POA, hereby allowing Rashida Brown to withdraw funds from my bank account without my permission and sell my automobile.

**C. Defendants**

2. Statement of the issues in this case.

**PART IX. MISCELLANEOUS**

Set forth any additional stipulations of counsel and/or motions on other matters which require action of the court

Set forth any notice required to be given under Rules 404(b), 609(b), 803(24) and 804(b)(5), Federal Rules of Evidence.

**PART X. NON-JURY TRIALS (If Applicable)**

No later than seven days prior to the scheduled trial date, counsel for each party shall submit to the District Judge, with a copy to opposing counsel, proposed findings of fact and conclusions of law. There is reserved to counsel the right to submit additional requests during the course of the trial on those matters that cannot reasonably be anticipated.

**PART XI. JURY TRIALS (If Applicable)**

No later than seven days prior to the scheduled trial date or at such time as the court may direct:

1. Each party shall submit to the District Judge and to opposing counsel a trial brief or memorandum with citations and authorities and arguments in support of the party's position on all issues of law.
2. Each party shall submit to the District Judge and to opposing counsel written requests for charges to the jury. Supplemental requests to charge that could not have been anticipated may be submitted any time prior to the arguments to the jury. All requests for charge shall be on a separate page or pages plainly marked with the name and number of the case; shall contain citations of supporting authorities; shall designate the party submitting the same; and shall be numbered in sequence.

If you have the capability, the Proposed Requests for Charge should be submitted on computer disk, Word Perfect format. A paper original for filing, as well as a paper copy, must be provided in any event.

3. Each party shall submit to the judge and to opposing counsel proposed voir dire questions.



**EACH OF THESE ITEMS IS TO BE FILED PRIOR TO THE  
FIRST TRIAL DATE EVEN IF THE CASE IS CONTINUED.**

**COUNSEL ARE ON NOTICE THAT FAILURE TO  
PROVIDE TIMELY COMPLIANCE WITH THE  
REQUESTS OF PART X AND PART XI MAY RESULT IN  
THE POSTPONEMENT OF TRIAL AND THE  
ASSESSMENT OF JUROR AND OTHER COSTS AND/OR  
THE IMPOSITION OF SANCTIONS.**

### CONCLUDING CERIFICATION

We hereby certify by the affixing of our signature to this Final Pretrial Order that it reflects the efforts of all counsel and that we have carefully reviewed all parts of this Order prior to its submission to the court. Further, it is acknowledged that amendments to this Joint Final Pretrial Order will not be permitted except where the court determines that manifest would result if the amendment is not allowed.

Attorney(s) for plaintiff

Attorney(s) for Defendant(s)

Ernest Wilkerson Pro Se

*Ernest Wilkerson*  
7-31-09

Entry for the forgoing Joint Pretrial Order is hereby APPROVED  
\_\_\_\_ THIS DAY \_\_\_\_\_ 2009

HONORABLE:  
Judge Ann Marie Donio  
UNITED STATES MAGISTRATE  
JUDGE  
Judge States District Court  
For the District of New Jersey

CC. To Judge Jerome B. Simandle  
CC. To Judge Anne Marie Donio  
CC. Steve Hallet

Exhibits

Exhibit

1

POWER OF ATTORNEY

This Power of Attorney is made on the 26<sup>th</sup> day of September, 1994.

BETWEEN: the Principal, ERNEST K. WILKERSON, whose address is 230 EUCLID AVE., TRENTON, NEW JERSEY 08609 individually referred to as "I" or "My",

AND: the Agent, RASHIDA J. BROWN whose address is 509 FARRAGUT AVE., TRENTON, NEW JERSEY 08618 referred to as "You".

GRANT OF AUTHORITY. I appoint You to act as my Agent (called an attorney in fact) to do each and every act which I could personally do for the following uses and purposes:

To ask, demand, sue for, recover, collect and receive all such sums of money, debts, dues, accounts, legacies, bequests, interests, dividends, annuities and demands whatsoever as are now, or shall hereafter become due, owing or payable or belonging to me, and have, use and take all lawful ways and means in my name or otherwise for the recovery thereof, by attachments, arrests, distress or otherwise, and to compromise and agree for the same, and acquittances, or other sufficient discharges for the same, for me, and in my name to make, seal and deliver; to bargain, contract, agree for, purchase, receive, and take lands, tenements and hereditaments and accept the seizing and possession of all lands and all deeds or other assurances, in the law therefor, and to lease, let, demise, bargain, sell remise, release, convey, mortgage and hypothecate lands, tenements and hereditaments, upon such terms and conditions, and under such covenants as he shall see fit. Also, to bargain and agree for, buy, sell, mortgage, hypothecate and in any and every way and manner deal in and with goods, wares, merchandise, chooses in action and other property in possession or in action, and to make, do, and transact all and every kind of business of what nature or kind soever, and also for me and in my name, and as my act and deed, to sign, seal, execute, deliver and acknowledge such deeds, leases and assignments of leases, covenants, indentures, agreements, mortgages, hypothecations, bottemries, charter-parties, bills of lading, bails, business bank withdrawals, personal bank withdrawals, bills, bonds, notes, receipts, evidences of debts, releases and satisfaction of mortgage, judgments and other debts, and such other instruments as may be necessary or proper as regarding my affairs.

Giving and granting unto my said attorney full power and authority to do and perform all and every act and thing whatsoever requisite and necessary to be done regarding my affairs, as fully to all intents and purposes as we might or could do if personally present, with full power of substitution or revocation, hereby ratifying and confirming all that my said attorney, or his substitute or substitutes, shall lawfully do or cause to be done by virtue of these presents.

SEP 28 1994

Exhibit D

WITNESS MY HAND this 26<sup>th</sup> day of September, 1994.

Ernest K Wilkerson  
ERNEST K. WILKERSON

9/26/94 WITNESSED BY: Mary Jefferson  
Date

DISABILITY

This Power of Attorney is effective now and remains in effect if I become disabled pursuant to N.J.S. 46:2b-8b.

Ernest K Wilkerson  
ERNEST K. WILKERSON

9/26/94  
Date

Mary Jefferson  
Witness

STATE OF NEW JERSEY :  
COUNTY OF MERCER : SS

I CERTIFY that on Sept. 26, 1994,

ERNEST K. WILKERSON personally came before me and acknowledged under oath, to my satisfaction, that this person( or if more than one, each person):

- (a) is named in and personally signed this document; and  
(b) signed, sealed and delivered this document as his and her  
act and deed.

Steve Hallett, Esq.  
**STEVE HALLETT, ESQUIRE**  
ATTORNEY AT LAW

Suite 1  
530 West State Street  
Trenton, New Jersey 08618

SEP 28 1994

CITY OF TRENTON EMPLOYEES CREDIT UNION

CHECK NO.

20073

PAYEE: RASHIDA J. BROWN  
 DATE: 09/29/94  
 CHECK AMOUNT: 681.22  
 ACCOUNT: 1885 WILKERSON, ERNEST KEITH

Exhibit  
 2

— CLOSE ACCT - POWER OF ATTY ON FILE —



CITY OF TRENTON  
 EMPLOYEES CREDIT UNION  
 319 EAST STATE STREET  
 TRENTON, NJ 08608

CORESTATES  
 NEW JERSEY NATIONAL BANK 01  
 85-73/312

200

DATE CHECK NO. AMOUNT

09/29/94 20073 \*\*\*\*\*681.22

SIX HUNDRED EIGHTY-ONE DOLLARS AND 22 CENTS\*\*\*

PAY  
 TO THE  
 ORDER OF

RASHIDA J. BROWN

AUTHORIZED SIGNATURE(S)

*Rashida J. Brown*  
*Ernest Keith Wilkerson*

⑈020073⑈ ⑆03⑆200730⑆ 01131651⑈

1-225-353-8800

**NORTHEAST AUTO IMPORTS, INC.**  
200 West Street Road  
FEASTERVILLE, PA 19017

United Valley Bank  
Pittsburgh, Pennsylvania

**Nº 002689**

**PAY** *See Invoice* **\$100,000.00** **1-11-19** **60214**  
**TO THE ORDER OF** *Virginia N. Council* **010199560** **41811** **4400** **5177**

**NORTHEAST AUTO IMPORTS, INC.**  
WHOLESALE ACCOUNT

**86-Verre** **10025** **10319** **14810** **09998** **000007000000**

FORM 108-CR (10-99) Replaces Form 108

-215-730-4030  
Wood Street



<b>NORTHEAST AUTO IMPORTS, INC.</b> 210 West Street Road Parsippany, NJ 07054		<b>NE 002906</b>	
PAY <u>Three Thousand dollars</u>		2.26 19 96	
TO THE ORDER OF <u>Virginia N. Cornil</u>		NORTHEAST AUTO IMPORTS, INC. Parsippany, NJ 07054	
16666666 00029066 00319021489022 070901		<b>NON-NEGOTIABLE</b> AUTHORIZED REPRESENTATIVE	
DETACH BEFORE DEPOSITING			
NORTHEAST AUTO IMPORTS, INC. - PARSIPPANY, NJ 07054			
1986 Chevy Cavalier 1560 # 107346			
DETACHED CHECK IS PAYMENT IN FULL OF ACCOUNT SHOWN ABOVE. IF PROCEEDS RETURN WITHOUT ALIENATION.			



ART400S1

## TITLE INFORMATION REQUEST/DISPLAY

DATE: 03/10/98

VIN: 1G1YY 6787G 59072 46  
 VEHICLE TYPE: CON  
 YEAR: 86  
 MAKE: CHE  
 MODEL: COR  
 FUEL: 0  
 STATUS:  
 LEMON:

## TITLE INFORMATION

VIN PREFIX: VIN SUFFIX:  
 GVW/PASS/LENGTH: 00007  
 AXLES/BOAT PROPUL: 2  
 COLOR/BOAT MATERIAL: RD  
 FLOOD VEHICLE (Y,N): N  
 POLICE/TAXI (P,T,B):  
 VIN REPLACEMENT NO:

Exhibit  
3

TITLE ISSUE DATE: 11 21 86  
 MILEAGE: 000103  
 NO OF DUPLICATES: 00  
 NO OF LIENHOLDERS: 1  
 STOP CODE: 0  
 LEASED VEHICLE: N

TITLE TYPE: STANDARD  
 MILEAGE STATUS: A ACTUAL MILEAGE  
 NO OF OWNERS: 1  
 INITIAL TRAN REF NO: QP8432500000102  
 PLATE NO: BKT54G

PF2-HARDCOPY  
 PF6-SALE INFO

PF3-END  
 PF9-LEASE INFO

PF11-CANCEL

PF5-OWNERS/LIEN  
 PF12-MAIN MENU

ART400S2

TITLE INFORMATION REQUEST/DISPLAY  
OWNER/LIENHOLDER INFORMATION

DATE: 03/10/98

PAGE: 1

VIN: 1G1YY 6787G 59072 46  
 RELATION: 0 ADD DATE: 11 21 86  
 AUTOPIC: W4342 23472 08642  
 STREET: 230 EUCLID AVE  
 RELATION: L ADD DATE: 11 21 86  
 AUTOPIC: 40000 00000 79361  
 STREET: PO BOX 1994  
 RELATION: ADD DATE:  
 AUTOPIC:  
 STREET:  
 (RELATIONS: 0-OWNER, C-CO-OWNER, L-LIENHOLDER, S-SUB LIENHOLDER)

VIN PREFIX: VIN SUFFIX:  
 SFD DT:  
 NAME: ERNEST K WILKERSON  
 CITY: TRENTON STATE: NJ  
 SFD DT: 12 10 92  
 NAME: CHAC  
 CITY: E HANOVER STATE: NJ  
 SFD DT:  
 NAME:  
 CITY: STATE:

PF2-HARDCOPY  
 PF6-SALE INFO

PF3-END

PF4-TITLE INFO  
 PF11-CANCEL

PF5-MORE OWNERS/LIENS  
 PF12-MAIN MENU

ART400S3

TITLE INFORMATION REQUEST/DISPLAY  
SALE INFORMATION

DATE: 03/10/98

VIN: 1G1YY 6787G 59072 46  
 TYPE OF SALE: D  
 DATE OF SALE: 11 21 86  
 DEALER ID NUMBER: 044060  
 SALES TAX EXEMPTION CD: 0  
 GROSS SALES PRICE: 31120.00  
 NET SALES PRICE: 31120.00  
 SALES TAX PAID: 1867.20

VIN PREFIX: VIN SUFFIX:  
 DEALER SALE

PF2-HARDCOPY  
 PF5-OWNERS/LIENS

PF3-END  
 PF11-CANCEL

PF4-TITLE INFO  
 PF12-MAIN MENU

Ernest K. Wilkerson  
Reg#11946-050 Unit 2-B  
FCI Schuylkill  
P.O. Box 759  
Minersville, PA. 17954-0759

Hon. Jerome B. Simandle  
Mitchell H. Cohen U.S. Courthouse  
One John F. Gerry Plaza  
Fourth And Cooper Street  
Camden, New Jersey 08101

In RE: Wilkerson v. Rashida Brown, et. al.  
Civil No. 96-4920 (JBS)  
May 11, 1998

Dear Hon. Judge Simandle:

Please be advised that on September 23, 1997 there was a telephone conference conducted by the Honorable Judge Kugler and the defendants in this civil action and myself the plaintiff. In addition, the Honorable Kugler requested the plaintiff to fact-find some proof of how much the plaintiff paid for his 1986 Chevrolet Convertible Corvette.

Although, the plaintiff try to contact the dealership where he purchased the said vehicle above from Tombin Chevrolet; located in Trenton, New Jersey. However, they are know longer in business. Indeed, the plaintiff also try to contact GMAC Finance Department who finance the vehicle for the plaintiff.

Unfortunately, they are unable to provide plaintiff with a copy of the contracts pertaining to this matter. [see exhibit "A"].

Moreover, the plaintiff tryed the motor vehicle services and requested a lien search. Because the plaintiff was advised that he could ascertain the vehicle's value by the amount of excise and/or sales taxes paid on it.

On the basis of this letter and your Honorable Judge Simandle the plaintiff just recently received that information that the Honorable Judge Kugler requested from the plaintiff. And the true value that the plaintiff paid for his 1986 Chevrolet Convertible Corvette, hence it is high lighted in yellow. Please examine exhibit "B1" and "B2" attach. Plaintiff would like to add these as new exhibit for the civil case.

Finally, in "exhibit B2" the plaintiff asserts that he presented \$9,800.00 down on his corvette to compel the gross sales price of \$31,120.00, the plaintiff submits that his payments was \$685.00 x 60 months with a 16% annual percentage rate, consistent of the total amount finance was \$41,100.00. In fact, the plaintiff purchased the vehicle for \$50,900.00

In conclusion, the plaintiff thank you for your consideration and patience of the above matter.

*Daniel Morris*  
NAME DANIEL MORRIS TITLE Case Manager  
AUTHORIZED BY THE ACT OF JULY 7, 1955 TO  
ADMINISTER OATHS (18 USC 4004).

Very truly yours,

*Ernest K. Wilkerson*  
Ernest K. Wilkerson

A

# GENERAL MOTORS ACCEPTANCE CORPORATION

P.O. Box 971 Horsham PA 19044

1-800-200-4622

BRANCHES THROUGHOUT  
THE WORLD

EXECUTIVE OFFICES  
DETROIT

May 1, 1998

Mr. Ernest Keith Wilkerson  
P. O. Box 759  
Reg #11946-05- Unit 2-B  
Minersville, Pa. 17954-0759

RE: 1986 Chevrolet

Dear Mr. Wilkerson:

We are unable to provide you with the information requested, as we are only required to retain paid-in-full documents for three years.

Sincerely,



Credit Administrator

B1

co- No

The State of



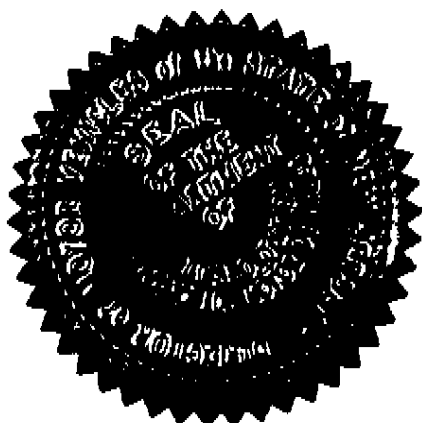
New Jersey

DEPARTMENT OF TRANSPORTATION  
DIVISION OF MOTOR VEHICLES

TO WHOM IT MAY CONCERN:

I, C. Richard Kamin, Director of the Division of Motor Vehicles of the State of New Jersey, do hereby certify that the annexed is a true abstract of the ownership records of the Division of Motor Vehicles for the vehicle indicated.

1986 CHEV 1G1YY6787G5907246



IN TESTIMONY WHEREOF: I have  
hereunto set my hand and  
affixed my official seal  
at Trenton this 10th day  
of March 1998.

C. Richard Kamin  
DIRECTOR OF MOTOR VEHICLES

A handwritten signature in black ink, appearing to read "Robert Damiani".

BY:

Robert Damiani, Manager  
Information & Systems Management

From: Mr. Ernest Wilkerson  
1307 Scenic Dr.  
Ewing, New Jersey 08628



To: Judge Jerome B. Simandle  
United States District Court  
Mitchell H. Cohen U.S. Courthouse  
One John F. Gerry Plaza  
Camden, New Jersey 08101

POSTNET